

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
:
CHUKWUEMEKA OKPARAEKE, :
a/k/a "Emeka," :
:
Defendant. :
- - - - - x

SUPERSEDING INDICTMENT

S3 17 Cr. 225 (NSR)

COUNT ONE

The Grand Jury charges:

1. From at least in or about July 2016, up to and including in or about March 2017, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance and a controlled substance analogue, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, conspired to distribute and possess with intent to distribute was 4-anilino-N-phenethyl-4-piperidine (known as "ANPP" or "4-ANPP"), in violation of Title 21, United States Code, Section 841(b)(1)(C).

4. The controlled substance analogue that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, conspired to distribute and possess with intent to distribute was 100 grams and more of mixtures and substances containing a detectable amount of N-(1-phenethylpiperidin-4-yl)-N-phenylacrylamide (known as "acryl fentanyl" or "acryloylfentanyl"), a controlled substance analogue, as defined in Title 21, United States Code, Section 802(32), that was intended for human consumption and is treated as a controlled substance in Schedule I of the Controlled Substances Act, and that is an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), in violation of Title 21, United States Code, Sections 813 and 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

5. From at least in or about July 2016, up to and including in or about November 2016, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka,"

the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substance analogues, in violation of Title 21, United States Code, Section 841(a)(1).

7. The controlled substance analogues that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, conspired to distribute and possess with intent to distribute were (a) 100 grams and more of mixtures and substances containing a detectable amount of N-(1-phenethylpiperidin-4-yl)-N-phenylfuran-2-carboxamide (known as "furanyl fentanyl"), a controlled substance analogue, as defined in Title 21, United States Code, Section 802(32), that was intended for human consumption and is treated as a controlled substance in Schedule I of the Controlled Substances Act, and that is an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), in violation of Title 21, United States Code, Sections 813 and 841(b)(1)(A); and (b) 3,4-Dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide (known as "U-47700"), a controlled substance analogue, as defined in Title 21, United States Code, Section 802(32), of

3,4-dichloro-N-[(1-dimethylamino) cyclohexylmethyl]benzamide (known as "AH-7921"), that was intended for human consumption and is treated as a controlled substance in Schedule I of the Controlled Substances Act, in violation of Title 21, United States Code, Sections 813 and 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT THREE

The Grand Jury further charges:

8. From in or about November 2016, up to and including in or about March 2017, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

9. It was a part and an object of the conspiracy that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

10. The controlled substances that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, conspired to distribute and possess with intent to distribute were (a) 100 grams and more of mixtures and substances containing a detectable amount of N-(1-phenethylpiperidin-4-yl)-N-phenylfuran-2-carboxamide (known as

"furanyl fentanyl"), an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), in violation of Title 21, United States Code, Section 841(b)(1)(A); and (b) 3,4-Dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide (known as "U-47700"), in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT FOUR

The Grand Jury further charges:

11. From in or about January 2017, up to and including in or about February 2017, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, knowingly and intentionally did import and attempt to import into the United States from any place outside thereof a controlled substance analogue, to wit, OKPARAEKE imported and attempted to import a controlled substance analogue into the United States from Hong Kong, in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 963.

12. The controlled substance analogue that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, knowingly and intentionally imported and attempted to import was 100 grams and more of mixtures and substances containing a detectable amount of N-(1-phenethylpiperidin-4-yl)-N-phenylacrylamide (known as "acryl fentanyl" or "acryloylfentanyl"), a controlled substance

analogue, as defined in Title 21, United States Code, Section 802(32), that was intended for human consumption and is treated as a controlled substance in Schedule I of the Controlled Substances Act, and that is an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), in violation of Title 21, United States Code, Sections 813 and 960(b)(1)(F).

(Title 21, United States Code, Sections 813, 952(a), 960(a)(1), 960(b)(1)(F), 963.)

COUNT FIVE

The Grand Jury further charges:

13. From in or about January 2017, up to and including in or about February 2017, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, intentionally and knowingly attempted to distribute and possess with intent to distribute a controlled substance analogue, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

14. The controlled substance analogue that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, intentionally and knowingly attempted to distribute and possess with intent to distribute was 100 grams and more of mixtures and substances containing a detectable amount of N-(1-phenethylpiperidin-4-yl)-N-phenylacrylamide (known as "acryl fentanyl" or "acryloylfentanyl"), a controlled substance analogue, as defined

in Title 21, United States Code, Section 802(32), that was intended for human consumption and is treated as a controlled substance in Schedule I of the Controlled Substances Act, and that is an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), in violation of Title 21, United States Code, Sections 813 and 841(b)(1)(A).

(Title 21, United States Code, Sections 813, 841(a)(1),
841(b)(1)(A), 846.)

COUNT SIX

The Grand Jury further charges:

15. In or about January 2017, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

16. The controlled substance that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," intentionally and knowingly distributed and possessed with intent to distribute was N-(1-phenethylpiperidin-4-yl)-N-phenylfuran-2-carboxamide (known as "furanyl fentanyl"), in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1),
841(b)(1)(C).)

COUNT SEVEN

The Grand Jury further charges:

17. In or about March 2017, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, knowingly and intentionally did import into the United States from any place outside thereof a controlled substance, to wit, OKPARAEKE imported a controlled substance into the United States from Hong Kong, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

18. The controlled substance that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, knowingly and intentionally imported was 3,4-Dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide (known as "U-47700"), in violation of Title 21, United States Code, Section 960(b)(3).

(Title 21, United States Code, Sections 952(a), 960(a)(1),
960(b)(3).)

COUNT EIGHT

The Grand Jury further charges:

19. In or about November 2016, in the Southern District of New York and elsewhere, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance analogue.

20. The controlled substance analogue that CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, intentionally and

knowingly distributed and possessed with intent to distribute was 3,4-Dichloro-N-[2-(dimethylamino)cyclohexyl]-N-methylbenzamide, (known as "U-47700"), a controlled substance analogue, as defined in Title 21, United States Code, Section 802(32), of 3,4-dichloro-N-[(1-dimethylamino)cyclohexylmethyl]benzamide (known as "AH-7921"), that was intended for human consumption and is treated as controlled substance in Schedule I of the Controlled Substances Act, in violation of Title 21, United States Code, Sections 813 and 841(b) (1) (C) .

21. The use of the controlled substance analogue distributed by CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, resulted in the death of Timothy N. Teklinsky, on or about November 10, 2016.

(Title 21, United States Code, Sections 813, 841(a) (1),
841(b) (1) (C) .)

FORFEITURE ALLEGATION

22. As a result of committing the offenses alleged in Counts One through Eight of this Indictment, CHUKWUEMEKA OKPARAEKE, a/k/a "Emeka," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used,

in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to:

a. a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses; and

b. all right, title and interest of the defendant in the following specific property: 680.3158331 bitcoins, including but not limited to:

- i. the balance (252.30636346 bitcoin) of bitcoin address 1PotQ1V1ffG3NAvwKM7XcNYe2PA3f5aspa;
- ii. the balance (17.45565801 bitcoin) of bitcoin address 1HzuqUjMymiSxbiddVkkz5Ed5SV8dY5TE6;
- iii. the balance (2.24978112 bitcoin) of bitcoin address 13QDhs1RHAbssAkTWXQHqyXmAkCeB66uni;
- iv. the balance (0.55796281 bitcoin) of bitcoin address 18FhEW12B7uV134TfAdAuhyiGCVhjRTKSa;
- v. the balance (0.29061206 bitcoin) of bitcoin address 1JCsNixVe5mgd4uFRw6gW8r1jMhfacKyhA;
- vi. the balance (0.00082528 bitcoin) of bitcoin address 1EXcCa5uVnNvnatUsQekr7c2Vg2D8ihxLc; and
- vii. the balance (407.45463031 bitcoin) of bitcoin address 1ApaYNbSwUS5uifXdGZzdXGJaJgowVMWY.


Substitute Assets Provision

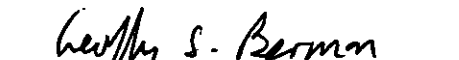
23. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

CHUKWUEMEKA OKPARAEKE,

Defendant.

SUPERSEDING INDICTMENT

S3 17 Cr. 225 (NSR)

(21 U.S.C. §§ 813, 841(a)(1),
841(b)(1)(A), 841(b)(1)(C), 846, 952(a),
960(a)(1), 960(b)(1)(F), 960(b)(3),
963.)


Foreperson.

GEOFFREY S. BERMAN
United States Attorney.
